

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY,

Defendant.

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-cv-00093-JRG

(LEAD CASE)

JURY TRIAL DEMANDED

Case No. 2:24-cv-00064-JRG

(Member case)

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff VirtaMove, Corp. (“VirtaMove”) and Defendants Hewlett Packard Enterprise Company (“HPE”) and International Business Machines Corp. (“IBM”) (collectively, “the Parties”) jointly and respectfully request that the Court amend its June 14, 2024 Docket Control Order (Dkt. No. 54) as reflected below and in the First Amended Docket Control Order attached hereto.

Original Deadline	New Deadline	Event
Wednesday, August 21, 2024	September 21, 2024	Defendants and Counter-Defendant Comply with Standing Order Regarding Subject-Matter Eligibility Contentions ¹

Counsel for HPE and IBM met and conferred with counsel for VirtaMove to discuss the extension of the deadline requested in this Motion. The Parties are jointly seeking the relief sought herein.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion and enter the proposed order attached hereto.

¹<http://www.txed.uscourts.gov/sites/default/files/judgeFiles/EDTX%20Standing%20Order%20Re%20Subject%20Matter%20Eligibility%20Contentions%20.pdf> [<https://perma.cc/RQN2-YU5P>]

Dated: August 15, 2024

By: /s/ Morgan Mayne

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for HPE and IBM met and conferred with counsel for VirtaMove to discuss the substantive issues addressed in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

By: /s/ Morgan Mayne
Morgan Mayne

CERTIFICATE OF SERVICE

I hereby certify that the foregoing is being served on all counsel of record who consent to electronic service on August 15, 2024.

By: /s/ Morgan Mayne
Morgan Mayne